

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT COURT OF VIRGINIA
RICHMOND DIVISION

George A. Yarid
1307 Stoney Creek Drive
Henrico, Virginia 23238,
Plaintiff,

v.

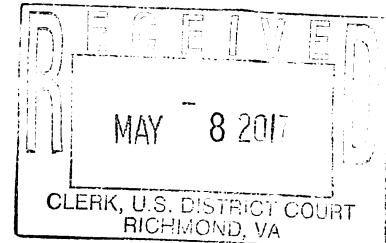
Civil Action No. 3:16-CV-756

William Markland
11271 Otsego Street
North Hollywood, California 91601.

Shon Brennan
5809 Los Amigo Street
Buena Park, California 90620.

Youtube, LLC
901 Cherry Avenue,
San Bruno, California 94066

Defendant(s).



4.28.2017

To whom it may concern:

In response to the attached summons:

I, Will Markland, ask that this case be dismissed on the grounds that “failure to state a claim upon which relief may be granted”.

MOST of Mr. Yard's facts about me are untrue, made up and just plain wrong!

Also, I defend my online actions under fair use and freedom of speech.

As Mr. Yarid is an online/public figure, the anti-SLAPP motion would seem to apply here as well.

In addition, Mr. Yarid does not file these claims with “clean hands”, in that, he has posted others intellectual property and material in his videos (some he has even sold on eBay) without their consent and with (I believe) the intent to bully and demean (Include using my public access show footage of “Insomnia Alnigh” without my consent!). Furthermore, this fictitious lawsuit, I believe, is driven by the fact that Mr. Yarid is going through a bankruptcy and this is his effort to “save his childhood home by any means”. In his bankruptcy, he refers to his show as having “no dollar value”.

Mr. Yarid, as early as last week, posted a video trolling/doing a derogatory imitation of “Piss4400”, a YouTuber, that Mr. Yarid has “offered to pay” to troll Shon Brennan.

Last but not least, if I were made to travel to Virginia, I would be in fear for my safety as Mr. Yarid has made numerous threats of violence against myself, saying: “Come to Virginia, and I will kick your ass and tape it for my show” and “If you come to Virginia, you won’t be leaving the state” and “This won’t be a video game this will be the real thing”.

I reserve the right to add additional defenses to the above.

Respectfully submitted,



Will Markland